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Attorneys for Defendant
HOME DEPOT U.S.A., INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ANNE ARTINO, an Individual,
Plaintiff,
vs.
HOME DEPOT U.S.A., INC., a
Delaware Corporation; KING OF
CENTRAL VALLEY II, L.P., a
California Limited Partnership; THE
VIGORO CORPORATION, a
Delaware Corporation; and DOES 1 to
50, Inclusive,
Defendants.

Case No. 1:22-cv-01588-TLN-KJN

**JOINT STIPULATION AND ORDER
TO CONTINUE EXPERT DISCOVERY
DATES**

Trial Date: None Set

Plaintiff ANNE ARTINO and Defendant HOME DEPOT U.S.A, INC., constituting
all parties appearing in this action, through undersigned counsel of record, hereby submit
this Joint Stipulation:

WHEREAS the Parties are scheduled for a mediation on July 9, 2024.

WHEREAS the Parties jointly agree that an extension of time is required to
complete the below expert discovery deadlines and stipulate to continuing the below dates
to the following:

1. Plaintiff's deadline to disclose expert reports be continued from June 7,
2024 to July 15, 2024;

2. Home Depot's deadline to disclose expert reports be continued from July 11, 2024 to August 19, 2024;
3. Deadline for disclosing any expert rebuttal reports be continued from August 2, 2024 to September 6, 2024;
4. Deadline to complete Expert Discovery be continued from October 10, 2024 to November 8, 2024.

WHEREAS the required time needed to complete the above discovery will not affect the date in which dispositive motions may be filed.

WHEREAS, the Parties have been diligently conducting discovery in this matter, including extensive written discovery, Plaintiff's attendance at a defense medical examination on February 9, 2024, Plaintiff's deposition, Plaintiff's family members and friends' depositions, Defendant's key employee deposition and Plaintiff's medical provider depositions.

WHEREAS, the Parties have met and conferred and hereby stipulate and agree that a continuance of the expert disclosure deadlines will enable the Parties to attempt informal resolution of this matter at mediation on July 9, 2024 and without incurring unnecessary trial and trial-related costs and costs associated with the completion of expert discovery.

WHEREAS the Parties jointly agree that all other deadlines will remain in place.

WHEREAS this request for extension of time to complete expert discovery is not intended to cause undue delay to the Court and will not prejudice any of the parties to this action, but is meant to preserve judicial efficiency in this matter.

Now, therefore, IT IS HEREBY STIPULATED by and between all the parties.

DATED: May 29, 2024

GOODMAN NEUMAN HAMILTON LLP

By: Angelique Hernandez
JOSHUA S. GOODMAN
ZACHARY S. TOLSON
ANGELIQUE HERNANDEZ
Attorneys for Defendant
HOME DEPOT U.S.A., INC.

1 DATED: May 29, 2024

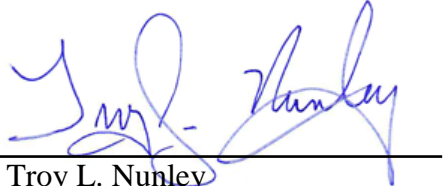
CARPENTER & ZUCKERMAN

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3 By: 

4 SARK OHANIAN
5 EDWARD HOVANNISIAN
6 Attorneys for Plaintiff
7 ANNE ARTINO

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9 **IT IS SO ORDERED.**

10 DATED: May 29, 2024

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Troy L. Nunley
United States District Judge